

**NAGEL RICE, LLP**

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- and -

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Attorney for Lungisile Ntsebeza, et al. on behalf of those similarly situated

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	)	Chapter 11
f/k/a GENERAL MOTORS CORP., <i>et al.</i> ,	)	
	)	Case No. 09-50026 (REG)
	)	
Debtors.	)	Jointly Administered
	)	

**VERIFIED STATEMENT OF NAGEL RICE, LLP PURSUANT TO  
RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Nagel Rice, LLP ("NR"), as one of a group of attorneys representing the parties designated herein, in these jointly administered Chapter 11 cases, submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, and states as follows:

1. Nagel Rice, along with other counsel, represent the creditors and parties in interest identified below:

NAME AND ADDRESS OF CREDITOR	NATURE AND AMOUNT OF CLAIM(S)	TIME OF ACQUISITION OF CLAIM(S)
Lungisile Ntsebeza Cape Town, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the	Pre-petition.

	debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	
Tozamile Botha Centurion, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Mpumelelo Cilibe New Brighton, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
William Daniel Peters Bethelsdorp, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
James Michael Tamboer Bethelsdorp, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of	Pre-petition.

	torture, CIDT and extrajudicial killing.	
Samuel Soyisile Mali Kwamagxaki, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Msitheli Wellington Nonyukela Zwelithsa, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Mantoa Dorothy Molefi Soweto, South Africa	This creditor as representative of a class of creditors who is a personal representative of one who suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Nothini Betty Dyonashe Duncan Village, South Africa	This creditor as representative of a class of creditors who is a personal representative of one who suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.

Nonkululeko Sylvia Ngcaka Duncan Village, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Miriam Mzamo Duncan Village, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Mncekeleli Henyn Simangentloki Jongilanga, Kuelerlig, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.
Hans Langford Phiri Mafikeng, South Africa	This creditor as representative of a class of creditors that has suffered gross human rights abuses arising from the debtors' actions in providing essential assistance to the apartheid state of South Africa resulting in actions of torture, CIDT and extrajudicial killing.	Pre-petition.

2. These plaintiffs have contingent and unliquidated claims in the above-captioned Chapter 11 proceeding pursuant to their claims in the putative class action, Ntsebeza v. Daimler AG, et al, MDL No. 02-1499 (S.D.N.Y.) under the Alien Tort Statute against GM.

Each of the *Ntsebeza (Botha)* plaintiffs is a victim of apartheid, torture or cruel, inhumane and degrading treatments or is a personal representative of a victim of extrajudicial killing by the South African Apartheid security forces between 1973-1999. Their complaint against GM alleges that GM aided and abetted these crimes in violation of international law and they seek damages and other relief from Debtor GM. Plaintiffs seek to represent a class of the above similarly situated victims.

3. Nagel Rice, along with several other firms, have represented some of these plaintiffs since they filed their initial claims in 2003 in the Southern District of New York (MDL 02-1499) and others who have been added through an Amended Complaint filed in 2008. The prosecution of the class, pending in that court, are currently stayed pending appeal.

4. NR does not hold any claim against or hold any interest in the Debtors.

5. The Creditors listed hereto may hold claims against one or more of the Debtors arising out of the other unrelated claims pursuant to their respective relationships with one or more of the Debtors.

6. NR reserves the right to revise, supplement or amend this Verified Statement as necessary.

7. NR makes this Verified Statement solely for disclosure purposes pursuant to Rules 2019 and nothing herein is, or should be construed as an admission, acknowledgment or waiver by the parties.

I, Diane E. Sammons, declare under penalty of perjury that I have read the foregoing and that it is true and correct to the best of my knowledge, information and belief.

Dated: Roseland, New Jersey  
June 22, 2010

NAGEL RICE, LLP

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